

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 12

PRE-CAST SPECIALTIES, INC.

Employer,

-and-

Case: 12-RC-139665

CONSTRUCTION AND CRAFT WORKERS  
LOCAL UNION NO. 1652

Petitioner.

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**PETITIONER'S MOTION TO STRIKE  
THE EMPLOYER'S REPLY BRIEF**

The Petitioner, Construction and Craft Workers' Local Union No. 1652 (Petitioner) files this Petitioner's Motion to Strike the Employer's Reply Brief. As cause, the Petitioner states as follows:

On February 11, 2015, the Hearing Officer's Report on Objections issued recommending that the Employer's objections be overruled in their entirety. Pursuant to Section 102.69 of the Board's Rules and Regulations, on February 24, the Employer filed Exceptions to the Hearing Officer's Report on Objections and a Brief in Support of Exceptions. On March 3, 2015, the Petitioner filed its Answering Brief.

On March 17, 2015, 14 days after the Petitioner's Answering Brief, the Employer filed a Reply Brief to Petitioner's Answering Brief to Employer's Exceptions to the Hearing Officer's Report on Objections. The Reply Brief is not authorized by Section 102.69 of the Board's Rules and Regulations. Furthermore, the Employer claims to be filing its Reply Brief pursuant to Section 102.46(h) of the Board's Rules and Regulations, which is not applicable to these proceedings.

WHEREFORE, the Petitioner respectfully requests that the Board strike the Reply Brief to Petitioner's Answering Brief to Employer's Exceptions to the Hearing Officer's Report on Objections.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Petitioner's Motion to Strike the Employer's Reply Brief has been served this 25th day of March 2015, via email addressed as follows: Margaret J. Diaz, Regional Director, Region 12, National Labor Relations Board, at [margaret.diaz@nrlrb.gov](mailto:margaret.diaz@nrlrb.gov), 2011 East Kennedy Blvd., Suite 530, Tampa, FL 33602-5824; and Charles Caulkins at [ccaulkins@laborlawyers.com](mailto:ccaulkins@laborlawyers.com), Steven M. Bernstein at [sbernstein@laborlawyers.com](mailto:sbernstein@laborlawyers.com), and Suhail M. Morales at [smorales@laborlawyers.com](mailto:smorales@laborlawyers.com), FISHER & PHILLIPS, LLP, 450 East Las Olas Blvd., Suite 800, Fort Lauderdale, FL 33301.

Respectfully submitted,

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